

December 1, 2011

Pamela Creedon, Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

Re: SJCDWQC Roberts Island monitoring locations for ILRP compliance

Dear Ms. Creedon,

The San Joaquin County Delta Water Quality Coalition (SJCDWQC) is submitting a request to update its Monitoring and Reporting Program Plan (MRPP; originally approved on September 15, 2008, amended MRPP was approved on January 18, 2011). The updates to the MRPP include 1) removal of two monitoring locations (Roberts Island Drain along House Rd and Roberts Island Drain @ Holt Rd), 2) adding a new monitoring location (Roberts Island @ Whiskey Slough Pump) as a replacement for the current Robert Island Drain locations, and 3) changing the Core site in Zone 4 from Roberts Island Drain @ Holt Rd to the proposed site at Roberts Island @ Whiskey Slough Pump.

The Coalition has been monitoring two locations on Roberts Island for several years, during which time several exceedances have occurred for constituents such as chlorpyrifos and diuron. The Coalition attempted to use Pesticide Use Reports (PUR) to track applications within the drainage area but had little success because no applications were reported. After reviewing the drainage area boundaries for these two sites, it was determined that the drainage areas for the two sites were larger than previously understood and depended on which discharge pumps on the island were activated. Because the pumps are activated automatically based on water level in the drainage canals, it is not always possible to determine where water is being drained.

After meeting with a grower on Roberts Island, the Coalition developed a better understanding of the movement of water on Roberts Island. The Coalition determined that the two current monitoring locations on Roberts Island do not capture irrigation drainage representative of the entire island. Irrigation drain water movement on Roberts Island is determined by pumping stations located on the northeast and west side of the island. The new proposed sample location (Roberts Island @ Whiskey Slough Pump) is in close proximity to the west pumping station and is a better location for representative sampling of the overall water quality on the island, including the two locations currently monitored on Roberts Island.

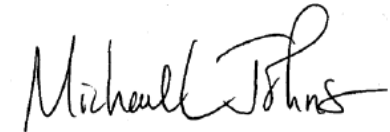
Associating past exceedances at both of the current site subwatersheds with PUR data has been difficult due to uncertainty of the movement of water on the island on a small scale. Replacing these two sites with a monitoring location at the main pump (Whiskey Slough Pump) will allow the Coalition to more accurately associate pesticide exceedances with applications on the island since the drainage area will be inclusive of all land with the potential to drain to this pump including both Roberts Island Drain locations previously sampled (along House and @ Holt). Although the area of the new drainage is larger than the combined areas of the two current drainages, the association of PUR data with exceedances will be more accurate allowing the Coalition to be more effective in its outreach.

The addition of the Roberts Island @ Whiskey Slough Pump location as a Core site for Zone 4 means monitoring at the two current sites, Roberts Island Drain along House Rd and Roberts Island Drain @ Hold Rd, is no longer necessary. The latter two sites are sub-drainages of the Whiskey Slough Pump drainage area and the Whiskey Slough Pump sampling location will capture discharge from each of the

other two drainages prior to reaching Delta main channels. The Coalition is requesting that monitoring be discontinued at Roberts Island Drain along House Rd and Roberts Island Drain @ Holt Rd and that monitoring be initiated at Roberts Island @ Whiskey Slough Pump starting January 2012. All Management Plan Monitoring that would have occurred at the former two locations will be conducted at the Roberts Island @ Whiskey Slough Pump location. In addition, the new Core site location at the Whiskey Slough Pump will be monitored as an assessment site in 2012.

The attachment contains site descriptions, site photographs and land use maps of the current and proposed sample locations. Additional documentation can be supplied as needed.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "Michael L. Johnson". The signature is fluid and cursive, with the first name "Michael" and last name "Johnson" clearly distinguishable.

Michael L. Johnson  
Technical Program Manager

Cc: Chris Jimmerson  
Susan Fregien

The Coalition is requesting to omit Roberts Island Drain along House Rd (N 37.9702, W -121.4074) and Roberts Island Drain @ Holt Rd (N 37.9556, W -121.4223) and add Roberts Island @ Whiskey Slough Pump (N 37.96698, W -121.46366) to the Coalition's Monitoring and Reporting Program Plan (MRPP) (Figures 1-3).

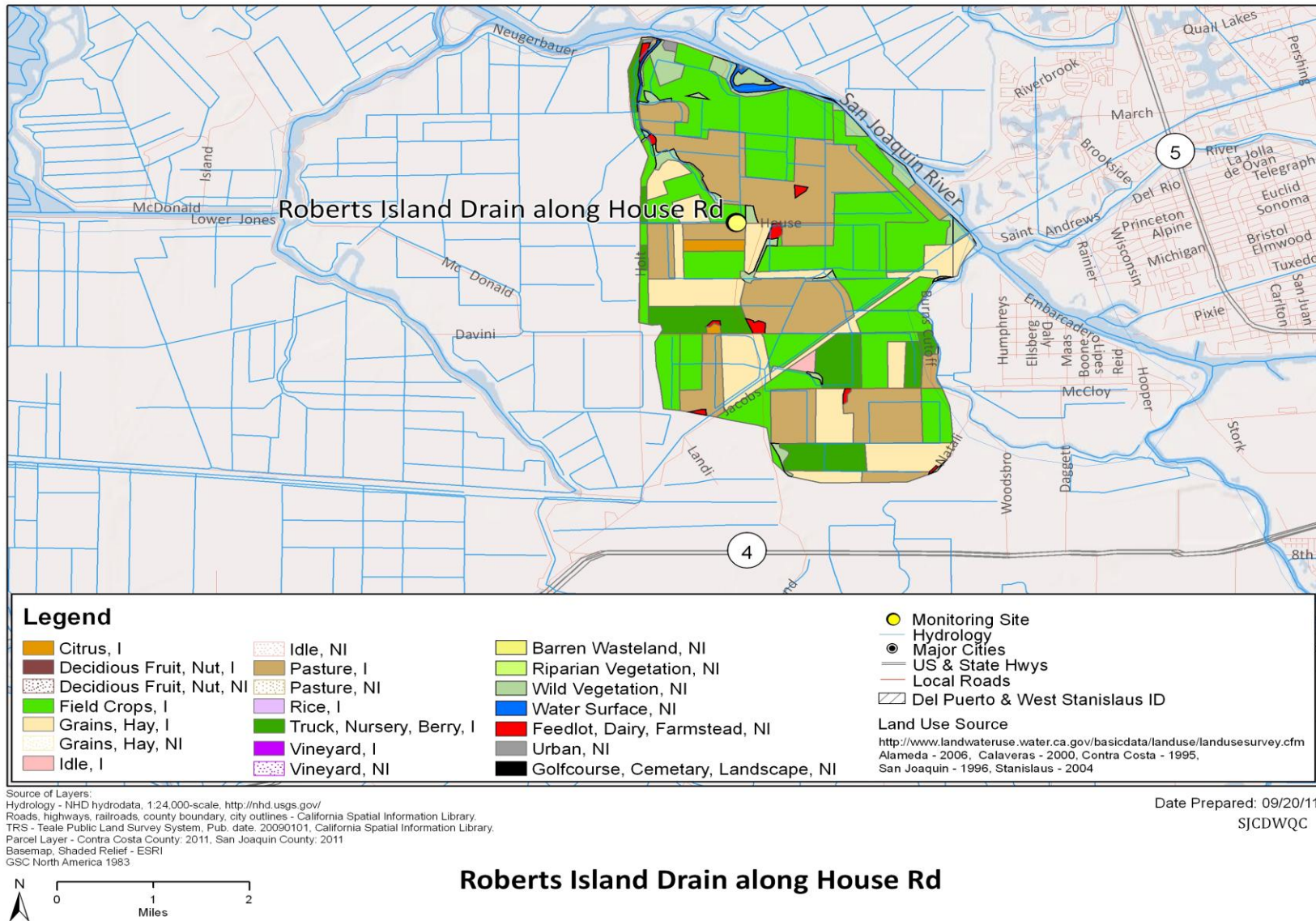
The Coalition has conducted monitoring at Roberts Island Drain @ Holt Rd from October 2008 through December 2011 and Roberts Island Drain along House Rd during the irrigation seasons of 2006 through 2008. The Coalition is requesting to move to the new proposed monitoring location, Roberts Island @ Whiskey Slough Pump, beginning January 2012. Monitoring at Roberts Island @ Whiskey Slough Pump will occur just upstream of the pumping station on the west side of the island (Figure 4).

Both of the current site subwatersheds on Roberts Island are scheduled to become high priority subwatersheds 2013-2015. Therefore, the Coalition will conduct Management Plan Monitoring at the new sample location Roberts Island @ Whiskey Slough Pump for all high priority constituents in a management plan for both Roberts Island Drain @ Holt Rd and Roberts Island Drain along House Rd subwatersheds during months of past exceedances. The constituents with the highest priority from the previous subwatersheds are chlorpyrifos, diuron and toxicity to *C. dubia*, *H. azteca* and *S. capricornutum*. The Coalition will conduct outreach to growers that have the potential to drain to the Whiskey Slough Pump monitoring location, which will include discussing management practices that can be implemented to prevent toxicity in the water column and sediment as well as prevent storm and irrigation tailwater runoff that contains applied pesticides.

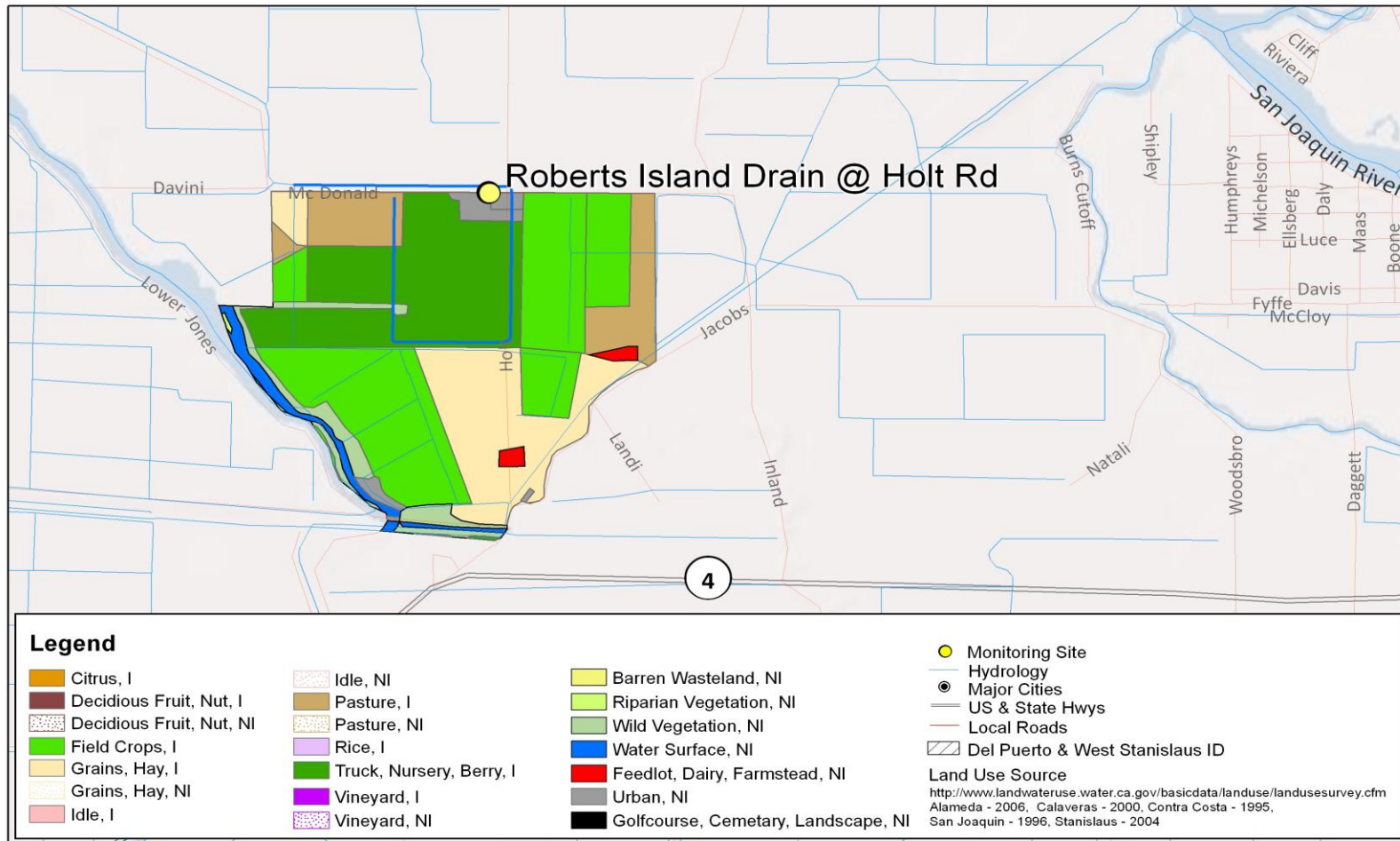
Below are site descriptions, irrigated acres, land use maps and site photos for the current and proposed sites:

- Roberts Island Drain along House Rd (1,229 irrigated acres) – This site subwatershed is located on the northeastern edge of Roberts Island. From the sample site, the water in the drain flows north. The primary agriculture in the site subwatershed is asparagus followed by field crops and pasture.
- Roberts Island Drain @ Holt Rd (1,134 irrigated acres) – This site subwatershed is a portion of Roberts Island that is drained by the pump along McDonald Road west of the sample site. It is located south of Roberts Island Drain along House Rd. The primary agriculture upstream of the sample site includes asparagus, field crops, grains, hay (alfalfa) and pasture.
- Roberts Island @ Whiskey Slough Pump (11,716 irrigated acres) – This site subwatershed drains the entirety of Roberts Island north of Hwy 4 by a pump located along McDonald Road on the western edge of the island. The primary agriculture upstream of the sample site includes asparagus, field crops, grains, hay (alfalfa) and pasture.

**Figure 1. Land use map of current monitoring site at Roberts Island Drain along House Rd.**



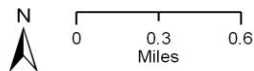
**Figure 2. Land use map of current monitoring site at Roberts Island Drain @ Holt Rd.**



Source of Layers:  
 Hydrology - NHD hydrodata, 1:24,000-scale, <http://nhd.usgs.gov/>  
 Roads, highways, railroads, county boundary, city outlines - California Spatial Information Library  
 TRS - Teale Public Land Survey System, Pub. date, 20090101, California Spatial Information Library  
 Parcel Layer - Contra Costa County: 2011, San Joaquin County: 2011  
 Basemap, Shaded Relief - ESRI  
 GSC North America 1983

Date Prepared: 08/16/11

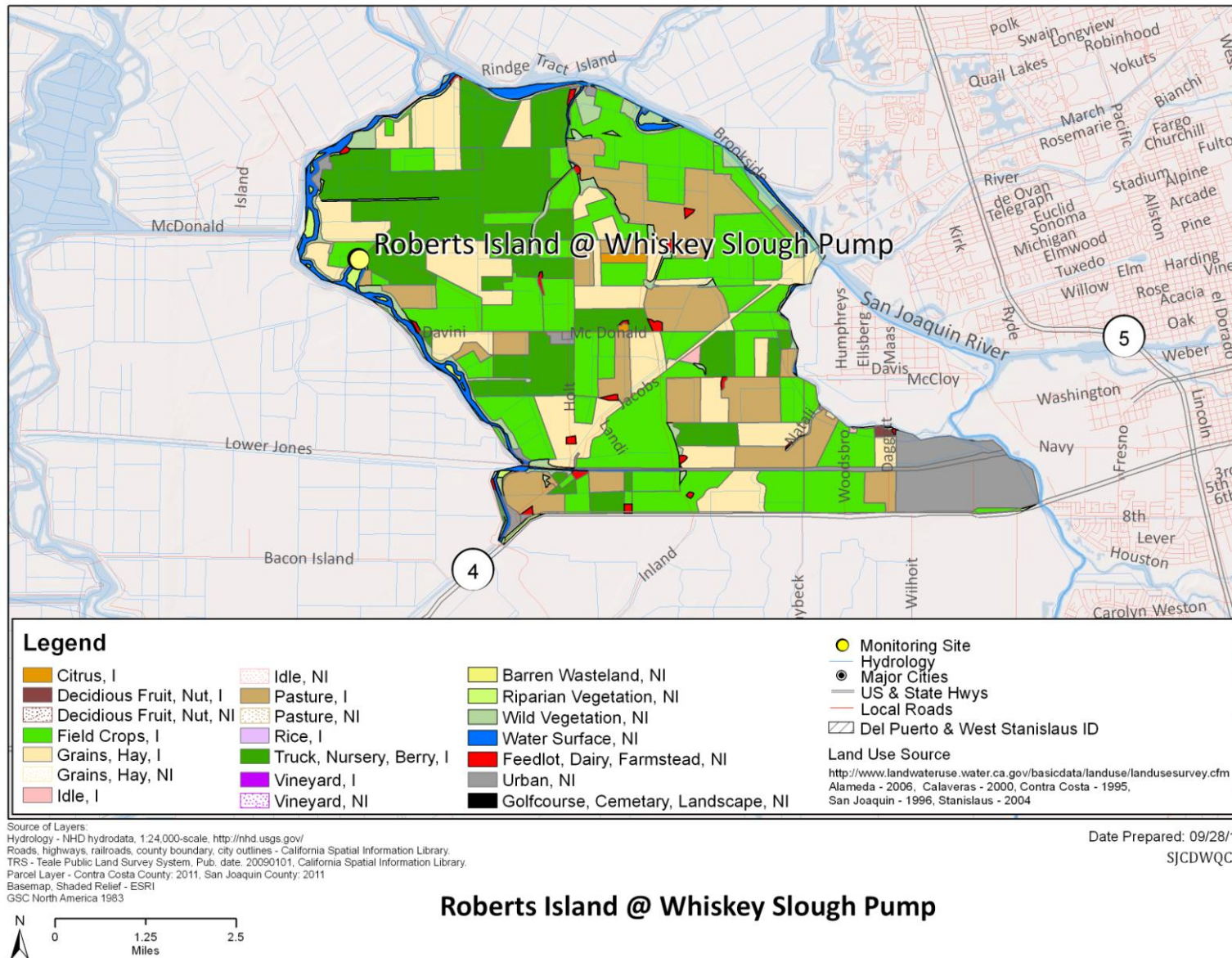
SJCDWQC



**Roberts Island Drain @ Holt Rd**



Figure 3. Land use map for proposed monitoring location at Roberts Island @ Whiskey Slough Pump.





**Figure 4. Photographs taken in the field at proposed monitoring location at Roberts Island @ Whiskey Slough Pump, facing east (A) and facing west (B).**

